

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIM. NO. 15-CR-49 (MJD/FLN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

HAMZA NAJ AHMED (1),
ADNAN ABDIHAMID FARAH (3),
ABDURAHMAN YASIN DAUD (4),
ZACHARIA YUSUF ABDURAHMAN (5),
HANAD MUSTOFE MUSSE (6),
GULED ALI OMAR (7),

Defendants.

**DEFENDANTS' JOINT
MOTION TO DISCLOSE
POST-CONSPIRACY
STATEMENTS OF ALLEGED
CO-CONSPIRATORS**

Defendants Hamza Naj Ahmed, Adnan Abdihamid Farah, Abdurahman Yasin Daud, Zacharia Yusuf Abdurahman, Hanad Mustofe Musse and Guled Ali Omar, by and through their undersigned counsel, herby move the Court pursuant to Rule 16(d)(1), Federal Rules of Criminal Procedure and *Bruton v. United States*, 391 U.S. 123 (1968); *Richardson v. March*, 481 U.S. 200 (1987); *Cruz v. New York*, 481 U.S. 186 (1987); *United States v. Garcia*, 836 F.2d 385, 390 (8th Cir 1987) for an order as follows:

1. Compelling the Government to give notice and disclosure of intent to use or refer to or introduce at trial the statement(s) or confession(s) of any alleged co-conspirator; and

2. Granting the defendants leave to file motions for suppression and/or motions *in limine* as indicated by the Government's response and a review of the relevant material.

This motion is based upon the indictment, the United States Constitution, the records and files in the above-entitled actions and any and all other matters which may be presented prior to or at the time of the hearing on the motion, which is hereby requested.

Respectfully submitted,

Dated: August 6, 2015

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